



December 15, 2020

**VIA ECF**

The Honorable Edgardo Ramos  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *In Re: Ex Parte Application of Eurasian Natural Resources Corporation Limited,*  
**20-mc-00312-ER****

Dear Judge Ramos:

On behalf of Applicant Eurasian Natural Resources Corporation Limited (“ENRC”), we write pursuant to Your Honor’s Individual Practices to request an extension of time to file our brief in opposition to Respondent’s motion to quash ENRC’s subpoena in the above-captioned case.

ENRC commenced this proceeding to obtain discovery in aid of five foreign proceedings, four of which are currently pending in the U.K., and one of which ENRC is preparing to file (the “Contemplated Proceedings”). While ENRC has been preparing its claims in the Contemplated Proceedings, there have been further developments, including recently discovered new evidence, which may require amendments to ENRC’s application. ENRC needs additional time to consider these developments and evidence before presenting them to this Court.

On October 27, 2020, this Court set the following briefing schedule for Respondent’s motion to quash: motion due on November 17, 2020; response due on December 8, 2020; and reply due on December 15, 2020. *See* Oct. 27, 2020 Minute Entry. On November 19, 2020, this Court granted Respondent’s request for a one-week extension of these deadlines. *See* Dkt. Nos. 21, 22.

ENRC and Respondent have discussed ENRC’s request for an extension and have agreed to a reciprocal extension of Respondent’s deadline to file a reply. Accordingly, ENRC respectfully requests that the Court enter an order endorsing the following briefing schedule:

Opposition brief due January 18, 2021  
Reply brief due February 8, 2021

Respondent consents to this extension. There has been one prior request from the Respondent for a one-week extension in this matter, which the Court granted.

Respectfully submitted,

/s/ Duane L. Loft

Duane L. Loft